

Chairperson: Bob Wyatt, NW Natural
Treasurer: Frederick Wolf, DBA, Legacy Site Services for Arkema

October 26, 2011

Chip Humphrey U.S. Environmental Protection Agency, Region 10 805 SW Broadway, Suite 500 Portland, OR 97205

Kristine Koch U.S. Environmental Protection Agency, Region 10 1200 Sixth Avenue, Suite 900, M/S ECL-115 Seattle, WA 98101-3140

Re: Response to EPA September 8, 2011 Letter Regarding EPA's Smallmouth Bass

Sampling (Lower Willamette River, Portland Harbor Superfund Site, USEPA

Docket No: CERCLA-10-2001-0240)

Dear Chip and Kristine:

The Lower Willamette Group (LWG) is in receipt of your letter dated September 8, 2011 which informed us of Environmental Protection Agency's (EPA's) smallmouth bass sampling effort in Portland Harbor. We understand that EPA intends to use this information to evaluate concentration trends in resident fish tissue and to help support establishment of a baseline for monitoring future remedy effectiveness (e.g., post-Record of Decision remedy implementation). We further understand that EPA is not requiring the LWG to perform this work but has invited individual LWG members to provide technical or financial assistance in this effort.

As you are aware, the LWG and EPA agreed earlier this year that the data collected by the LWG over the past 10 years are adequate to complete the Remedial Investigation, including the human health and ecological risk assessments. These documents are slated for final EPA approval this calendar year. We also agreed that another data collection effort was not necessary to develop and submit the draft Feasibility Study, and the LWG is confident that the existing robust FS data set is more than adequate to complete the final FS. The FS data set includes thousands of samples and over a million data points (e.g., sediment, surface water, stormwater, transition zone water, beach sediment, groundwater, and biota data [including various fish, invertebrate, bird egg, and benthic samples]), as well as physical system information.

The LWG looks forward to examining the analytical results from EPA's smallmouth bass sampling effort.

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We also look forward to continuing this dialogue as we enter the final stage of the project.

Sincerely,

Bob Wyatt

cc: Confederated Tribes and Bands of the Yakama Nation

Confederated Tribes of the Grand Ronde Community of Oregon

Confederated Tribes of Siletz Indians of Oregon

Confederated Tribes of the Umatilla Indian Reservation

Confederated Tribes of the Warm Springs Reservation of Oregon

Nez Perce Tribe

Oregon Department of Fish & Wildlife

United States Fish & Wildlife

Oregon Department of Environmental Quality

LWG Legal

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